

Exhibit B

Texas scrambling to train poll workers

Officials must train workers, educate voters after court ruling

By David Saleh Rauf

August 19, 2016 Updated: August 19, 2016 8:45pm

AUSTIN - With roughly two months before early voting starts, Texas election officials are facing the difficult task of training thousands of poll workers and educating the public about court-ordered changes to a voter ID law - all while under an intense microscope.

That process is expected to be exacerbated by the sheer size of Texas, the volume of county election offices - 254 in all - an extreme time crunch and a politically-charged environment.

The heavy lifting starts now.

The Texas Secretary of State's office late this week circulated final instructions to county officials about identification requirements for the Nov. 8 election - materials that will serve as guidance for local election administrators doing training.

In less than two weeks, Secretary of State Carlos Cascos is planning to embark on a statewide tour, where, according to court documents, he could visit San Antonio, Houston, Dallas, El Paso and the Rio Grande Valley, among a list of potential sites, to talk voter ID.

And around the same time, Texas is poised to start recording television and radio spots set to air in October, court documents say, the first steps in an estimated \$1.3 million advertising campaign. That will also include digital, print and social media ads slated to start appearing by the first week of September.

It's part of a collective education effort Texas agreed to after the 5th U.S. Circuit Court of Appeals ruled last month that the state's photo ID law discriminated against minorities.

The federal appeals court, considered one of the most conservative in the country, ordered the law to be weakened for November's election - a task that now falls on thousands of local election foot soldiers across the state to put in place.

"It's going to be a real challenge. It takes a long time to get this election machinery moving, and the closer it gets to the election the more likely the implementation of the changes will get screwed up in various places," said Joseph Fishkin, an assistant professor at the University of Texas at Austin who specializes in constitutional and election law. "You have so many poll workers in Texas that are well meaning but not necessarily well trained. There's going to be a lot of low-level questions about how to implement the ruling successfully."

Moving forward

Texas, under the direction of Attorney General Ken Paxton, agreed to a settlement earlier this month that keeps its voter ID law in place but allows for those lacking one of seven forms of required identification to cast a regular ballot by presenting an alternate ID and signing an affidavit. That's expected to provide a safety net for most of the estimated 600,000 Texans registered to vote but who lacked an approved ID under the measure.

The state will also spend \$2.5 million on a voter outreach program designed by public relations giant Burson-Marsteller, some details of which were released in court documents this week.

Meanwhile, Attorney General Ken Paxton has said he will challenge the 5th Circuit's ruling to the U.S. Supreme Court. That has yet to happen, and the

scope of Paxton's appeal isn't clear, either. A spokeswoman in his office declined comment Friday.

The pending situation, however, has not slowed down the state's outreach efforts that were mandated by the court, said Alicia Pierce, a spokeswoman for the Secretary of State's office.

"We are operating under court order with clear direction and guidelines and we'll continue to move forward with educating voters until we hear differently," Pierce said. "If something changes we will work to educate voters on what will be developed."

Likewise, election officials in Bexar, Harris and Travis Counties said they are planning to move forward with training thousands of poll workers on the court's changes to the photo ID law. Election officials in Fort Worth and Dallas did not return requests for comment.

In Bexar, officials are expected to train more than 1,500 poll officials, said Elections Administrator Jacque Callanen. The only uncertainty at the moment, she said, is what could happen with the state's appeal.

"We'll be holding our breath to see how we move forward, but if things stay the same as they are now, we shouldn't have too much of a problem," said Callanen. "We can train people and say, 'Maybe this will happen and we'll let you know when you come pick up your supplies.' Is it optimal, no, but is it doable, yes."

Harris County Clerk and chief election official Stan Stanart, who oversees one of the largest county election operations in the nation, said Friday he does not expect any problems with putting in place changes to the law. That's mostly because he is not expecting much of an influx of people lacking one of the state-approved ID.

"The numbers are going to be small," said Stanart, who estimates 6,000 election workers will be trained in Harris County before November. "That's our experience with voter ID."

'A lot of confusion'

But Stanart also issued a warning: his office will look into those signing affidavits claiming they don't have required identification. He said voters who lied will be turned over to the district attorney.

"People are signing an oath. They are swearing they don't have an ID," he said. "If they think they can come in and vote without an ID when they have one sitting in their pocket, that's going to be a problem."

The smooth sailing scenario offered by local elections officials stand in contrast to what some others are predicting.

Zenén Jaimes Pérez, spokesman for the Texas Civil Rights Project, a group involved in voting rights issues, said his organization is expecting the implementation to be bumpy since so many people need to be trained in such a short time frame.

"There's already a lot of confusion," Perez said, noting that his organization will be setting up a voter protection hotline ahead of November's election for people to report voter ID-related issues.

Chad Ruback, a Dallas-based appellate lawyer who has been following the case, had a much bleaker prediction.

"To speak in Texan, it'll be a big ol' mess. You have 254 counties, many of which are rural and remote, and getting election administrators up to speed is going to be difficult," he said. "I'm confident the election administrators will

try hard to get it right, but there's no doubt there's going to be a multitude of complaints."